

April 29, 2011

Ms. Laura Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated March 25, 2011 regarding our 2010 30 day Post-General FEC report.

The National Republican Congressional Committee was authorized to make coordinated expenditures on behalf of Jesse Kelly and Ben Quayle by both the Republican National Committee and the Arizona Republican Party; on behalf of David Jeffrey Harmer by both the Republican National Committee and the California Republican Party; on behalf of Sam Caligiuri by both the Republican National Committee and the Connecticut Republican State Central Committee; on behalf of David Rivera and Allen B. West by both the Republican National Committee and the Republican Party of Florida; on behalf of Kevin W. Yoder by both the Republican National Committee and the Kansas Republican Party; on behalf of Jeffrey Davis Perry by both the Republican National Committee and the Massachusetts Republican State Congressional Committee; on behalf of Joe Heck by both the Republican National Committee and the Nevada Republican State Central Committee; on behalf of Charles F. Bass by both the Republican National Committee and New Hampshire Republican State Committee; on behalf of Jon Runyan by both the Republican National Committee and the New Jersey Republican State Committee; on behalf of Randolph Altschuler, Ann Marie Buerkle, Matt Doheny, Christopher Patrick Gibson, and Michael Grimm by both the Republican National Committee and the New York Republican Federal Campaign Committee; on behalf of Ilario Gregory Pantano by both the Republican National Committee and the North Carolina Republican Party; on behalf of Steve Chabot, Bill Johnson and James B. Renacci by both the Republican National Committee and the Ohio Republican Party State Central Committee; on behalf of Michael G. Fitzpatrick, Thomas Anthony Marino, and Keith J. Rothfus by both the Republican National Committee and the Republican Federal Committee of Pennsylvania; and on behalf of Scott Eugene Desjarlais by both the Republican National Committee and the Tennessee Republican Party. Therefore, there are no excessive coordinated expenditures with respect to these candidates. However, the FEC's electronic filing software permits only one authorizing committee to be listed.

The line 17 receipts (including the receipt from New Pioneers PAC) are Recount contributions, and thus are reported on the correct line number. We have amended this report to reflect a recount designation for these receipts.

The Commission's website lists New Pioneers PAC as a non-qualified PAC. The 2010 regular contributions from this PAC totaled \$30,400, and the 2010 Recount contributions totaled \$ 30,400, which was the permissible limit for non-qualified PACs. Therefore, there is no excessive donation from this PAC.

We have issued a refund of \$ 5,000 to Mr. Thomas H. Patrick, and a refund of \$5,100 to Mr. Mike L. Swinford. Both refunds will be itemized on our May 20 monthly FEC report.

With respect to the receipts from New Sunshine, LLC: this entity is treated as a partnership under IRS rules, and thus this is a permissible donation. The donor memo attribution for this contribution was correctly disclosed as Mr. Stephen Hilbert on page 2682 of the original report. Mr. Hilbert's entry is itemized as a memo receipt from a 10/15 transfer from the 2010 Indiana Republican Victory Fund, and his occupation/employer information indicates that he is a partner at New Sunshine, LLC. Thus there is no amendment required with respect to this entry.

The line 15 receipts referenced in your letter from Andy Barr for Congress, Inc., Bucshon for Congress, Friends of Todd

ETEXT ATTACHMENT

Young, Hoosiers for Rokita, and Lally for Congress, resulted not from expenditures to these entities, but from payments made to Kevin W. McGrann.

The reimbursements from Ann Marie Buerkle for Congress, Charlie Dent for Congress, Chris Lee for Congress, Harold Johnson for Congress, Jim Gerlach for Congress Committee, Lou Barletta for Congress, Mike Kelly for Congress, The Freedom Project, Tim Walberg for Congress, Tom Reed for Congress, and Walorskie for Congress Inc., result not from expenditures to these entities, but from payments made to Whitaker Askew.

The line 15 receipt from Automatic Data Processing (ADP) represents reimbursement from ADP for COBRA payments made by COBRA participants to ADP in ADP's administration of the Committee's COBRA service. While there is no specific Committee disbursement to ADP to which this refund is tied, the Committee now makes its healthcare payments to Guardian Life Insurance Company.

The reimbursement from SCOTT PAC results not from an expenditure to this entity, but from payments made to American Express, and more specifically, these ultimate vendors:

MARRIOTT HOTELS
10400 FERNWOOD RD
BETHESDA, Maryland 20817
10/14/2010 TRAVEL 220.75
MEMO

DELTA AIRLINES INC
PO BOX 20706
ATLANTA, Georgia 30320
10/14/2010 TRAVEL 952.40
MEMO

DELTA AIRLINES INC
PO BOX 20706
ATLANTA, Georgia 30320
10/14/2010 TRAVEL 952.40
MEMO

CONTINENTAL AIRLINES
PO BOX 4658
HOUSTON, Texas 772104658
10/14/2010 TRAVEL 563.20
MEMO

CONTINENTAL AIRLINES
PO BOX 4658
HOUSTON, Texas 772104658
10/14/2010 TRAVEL 563.20
MEMO

HYATT HOTELS
71 S WACKER DR 16TH FLOOR
CHICAGO, Illinois 60606
10/14/2010 TRAVEL 203.02

Image# 11931285758
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MEMO

The reimbursement from Wilkins Enterprise results from a payment made on 8/6/09 for \$ 7,427.50.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

The void check (\$ 16,300) to Craft Media Digital was reissued on 11/4/10. The original check date was 10/6/10.

The payments referenced in your letter for Catering, Catering/Facility Rental, Facility Rental, Facility Rental/Catering, Fundraising Phone Calls, and In-Kind: Invitations and Postage were operating and administrative payments solely benefiting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

We have now sent three separate follow-up letters to the contributing entities for which we do not have the attribution information, requesting that they provide us information with respect to the individual member(s) and partner(s) to whom the donations are to be attributed. Should any of the attributions to an individual exceed \$200 aggregate, we will report the applicable individual attribution(s).

The Committee has filed an amended Form 1 to list Harmer Victory Committee as a joint fundraising representative.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee

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